

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 4:25-CR-00127 AGF JSD

JUAN SABRE-ZUNIGA,

Defendant.

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Dianna R. Collins, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Unlawful Re-entry into in the United States by a Removed Alien, in violation of Title 8, United States Code, Section 1326(a).
2. Pursuant to Title 18, United States Code, Section 3142(g): the defendant's presence in our country is unlawful. He is currently in the Eastern District of Missouri after having been removed from this country before. He was arrested by HSI in Missouri. The defendant is a citizen of Mexico and has no legal status in this country. He was ordered removed on 7/9/2003. He has prior convictions for statutory rape and illegal reentry.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
UNITED STATES ATTORNEY

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